

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 3:18CR162
)	
Plaintiff,)	JUDGE JAMES G. CARR
)	
v.)	
)	
KELLAND JAMIESON WRIGHT,)	<u>PROPOSED PROTECTIVE ORDER</u>
)	
Defendant.)	

This matter is before the Court upon the Government's application, pursuant to Criminal Rule of Procedure 16(d)(1), for a Protective Order to restrict access to certain discovery materials.

The Court finds and orders as follows:

(1) There is good cause to believe that the restriction of certain discovery information, including records containing personal identifiers and financial information of victims/witnesses and Jencks Acts materials, under the terms set forth in this Order, will ensure the safety of victims/witnesses, protect the personal information of individuals involved in the case, preserve the integrity of the discovery process and serve the ends of justice, while protecting the rights of the Defendant to the disclosure of evidence under Criminal Rule of Procedure 16(a) and to adequately assist counsel in the preparation of a defense.

(2) It is ordered that counsel for the Government clearly identify to defense counsel those discovery materials that it deems in need of protection. Such materials shall be clearly marked,

“Protected Material.” If a compact disc or DVD is marked “Protected Material,” the term “Protected Material” applies to the entire contents of the compact disc or DVD.

(3) It is ordered that items marked “Protected Material,” which are disclosed by the Government to defendant’s counsel, must be maintained in a secure location. Discovery items may be disclosed and shared amongst defense counsel’s representatives, agents, and staff.

(4) It is ordered that counsel for the Defendant may copy “Protected Material” and provide the copy, electronic or otherwise, of the “Protected Material” for the purpose of sharing the material with counsel’s representatives, agents, and staff.

(5) It is ordered that if the Defendant is in possession of a copy of “Protected Material,” then the Defendant must not photocopy, photograph, or make any copy, electronic or otherwise, of the “Protected Material” discovery items.

(6) It is ordered that if the Defendant is in possession of a copy of “Protected Material,” then the Defendant must maintain that copy in a secure location.

(7) It is ordered that counsel for Defendant is prohibited from providing access to “Protected Material” discovery to any person who is not directly associated with the legal representation of his client, except under the terms set forth in this Order.

(8) It is ordered that Defendant is prohibited from making use of the discovery items disbursed in the above-captioned case in any other proceedings, including any civil lawsuits or administrative proceedings.

James G. Carr
United States District Judge

Dated: _____